

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Erica Heckle,

Plaintiff,

v.

Matrix Absence Management, Inc.,

Defendant.

Case No. 7:21-cv-1463 VB

**NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR
APPROVAL OF ATTORNEYS' FEES AND EXPENSES**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law and the attached exhibit, the Second Declaration of Molly A. Elkin, Plaintiff moves this Court for an Order awarding attorneys' fees to Class Counsel in the amount of \$1,416,666.67 (equaling one-third of the settlement fund) and expenses in the amount of \$23,917.47, as set forth in the Parties' Settlement Agreement (Dkt. 78-1). As set forth in the accompanying Memorandum of Law, the fees requested pursuant to the Settlement Agreement are reasonable and in line with other common fund fee awards in the Second Circuit. Similarly, the expenses sought were necessarily incurred in the prosecution of this litigation. The Defendant does not oppose the relief sought herein. Thus, Plaintiff respectfully requests that this Court grant this Motion as a part of its Order granting final approval of the Settlement Agreement.

Dated: October 12, 2023

Respectfully submitted,

/s/ Molly A. Elkin

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Counsel for Plaintiff and the Class

CERTIFICATE OF SERVICE

This is to certify that, on October 12, 2023, the foregoing document and exhibits were filed with the Court through the Court's CM/ECF filing system, which will serve copies all Counsel of Record who have entered appearances in this matter.

/s/ Molly A. Elkin
Molly A. Elkin